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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MONDIS TECHNOLOGY LTD.,

Plaintiff,

v.

LG ELECTRONICS INC. and
LG ELECTRONICS U.S.A., INC.,

Defendants.

Civil Action No. 15-04431(SRC/CLW)

**NOTICE OF MOTION *IN LIMINE*
NO. 2 UNDER *DAUBERT* TO
PRECLUDE EVIDENCE OR
ARGUMENTS BY MONDIS'S
EXPERTS RELATING TO
COMMERCIAL SUCCESS, AND
ANY DAMAGES-RELATED
OPINIONS BASED ON SUCH
EVIDENCE OR ARGUMENTS**

Electronically Filed

PLEASE TAKE NOTICE that pursuant to the schedule to be set forth by the Court, the undersigned counsel for Defendants LG Electronics Inc. and LG Electronics U.S.A., Inc. (collectively, "LG"), shall move *in limine* before the Honorable Stanley R. Chesler, U.S.D.J., at the United States District Court for the

District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order pursuant to *Daubert* to preclude evidence or arguments by Plaintiff's experts relating to commercial success, and any damages-related opinions based on such evidence or arguments, and disallow Plaintiff from offering any evidence, testimony, or arguments regarding the same.

PLEASE TAKE FURTHER NOTICE THAT in support of the within Motion *in limine* No. 2, LG will rely upon its Brief, Declaration of Liza M. Walsh with exhibits attached thereto, and any additional submissions made hereafter. A proposed form of Order is also submitted for the Court's consideration.

Dated: November 28, 2018

Respectfully submitted,

s/ Liza M. Walsh

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